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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

19 CALIFORNIA COALITION FOR WOMEN
20 PRISONERS et al.,
21 Plaintiffs,
22 v.
23 UNITED STATES OF AMERICA FEDERAL
24 BUREAU OF PRISONS et al.,
25 Defendants.

Case No. 4:23-cv-04155-YGR

**DECLARATION OF OREN NIMNI IN
SUPPORT OF PLAINTIFFS'
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIALS SHOULD BE
SEALED REGARDING PORTIONS
OF PLAINTIFFS' OPPOSITION TO
DEFENDANTS' MOTION TO
DISMISS**

Date: July 30, 2024
Time: 2:00 p.m.
Crtrm.: 1, 4th Floor

Judge: Hon. Yvonne Gonzalez Rogers

Trial Date: June 23, 2025

Case No. 4:23-cv-04155-YGR

DECL. OF OREN NIMNI ISO PLFS' ADMIN. MOT. TO CONSIDER WHETHER ANOTHER PARTY'S MATERIALS
SHOULD BE SEALED REGARDING PORTIONS OF PLFS' OPPOSITION TO DEFS' MOT. TO DISMISS

1 I, Oren Nimni, hereby declare as follows:

2 1. I am an attorney duly admitted to practice before this Court. I am Director of
3 Litigation at Rights Behind Bars and counsel of record for the Plaintiffs and Proposed
4 Class. I have personal knowledge of the facts set forth herein, and if called as a witness I
5 could competently so testify. I make this declaration in support of Plaintiffs'
6 Administrative Motion to Consider Whether Another Party's Material Should Be Sealed.

7 2. Attached as Exhibit A is a true and correct copy of the Special Master's
8 Report.

9 3. Attached as Exhibit B is a true and correct copy of unredacted Plaintiffs'
10 Opposition to United States' Notice of Motion to Dismiss, Stay Discovery, and Terminate
11 Prospective Relief with the redacted excerpts referring to the Special Master's Report
12 highlighted.

13 I declare under penalty of perjury under the laws of the State of California that the
14 foregoing is true and correct, and that this declaration is executed at Washington, D.C. this
15 2nd day of July, 2024.

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17 By: /s/ Oren Nimni

18 Oren Nimni

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